

Initial Appraisal of a European Commission Impact Assessment

Improving road infrastructure safety management

Impact assessment (SWD(2018) 175, SWD(2018) 176 (summary)) accompanying a Commission proposal for a directive of the European Parliament and of the Council amending Directive 2008/96/EC on road infrastructure safety management

This note provides an initial analysis of the strengths and weaknesses of the European Commission's [impact assessment](#) (IA) accompanying the above-mentioned [proposal](#), adopted on 17 May 2018 and referred to Parliament's Committee on Transport and Tourism (TRAN). The proposal is a part of a [policy framework](#) responding to new challenges in road safety for the period 2021-2030.

The present EU regulatory framework on road infrastructure safety management (RISM) contains two pieces of legislation: [Directive 2008/96/EC](#) on road infrastructure safety management (the RISM Directive), and [Directive 2004/54/EC](#) on minimum safety requirements for tunnels in the trans-European road network (the Tunnels Directive). While the RISM Directive details specific procedures covering all Trans-European Transport (TEN-T)¹ infrastructure life-stages, the Tunnels Directive addresses special safety concerns regarding long road tunnels.² Both pieces of legislation only apply to the TEN-T network. However, the proposal mentioned above and the IA only marginally address the Tunnels Directive.

To improve EU road safety and substantially reduce road deaths, several measures were taken at EU level. A general policy document was adopted in 2010, when the European Commission published the [Road Safety Programme 2011-2020](#).³ This programme enumerated seven strategic objectives that should further increase road safety and halve the amount of road deaths by 2020.⁴ These strategic objectives focus on the issues of vehicle safety, infrastructure safety, and road users' behaviour. Road infrastructure and road surroundings are a contributing factor in approximately 30 % of road accidents (IA, p. 3). The current revision of the RISM procedures was triggered by stalled progress in the reduction of road fatalities, and the need to adapt existing road security measures to changes in mobility resulting from societal trends and technological developments (IA, p. 3). To address these challenges, two ex-post evaluation studies of the two directives⁵ were prepared by the Commission (see below).

Problem definition

The **general problem** to be tackled by the initiative is identified as the **high number of fatalities and injuries on EU roads**, with road infrastructure being an important cause and severity factor in road accidents (IA, p. 9). The IA notes that, since 2010, EU Member States have improved their road safety records, although it acknowledges 'a significant gap in performance across the EU' (IA, p. 9). Based on evaluation of road fatalities across the EU on different types of roads, the IA highlights that motorways are the safest (IA, p. 10).

The IA also provides more specific information on the evolution of road fatalities, their division by transport mode in 2016, and shares of accidents by road user (IA, p. 9-13). The IA also estimates, based on the supporting study, that the yearly cost of road fatalities and serious injuries is around €121 billion (IA, p. 11).

Subsequently, the IA identifies two **main problems** (IA, pp. 14-16):

(1) A large share of TEN-T travel in the east and some parts of the west of Europe is on roads with low safety performance

The IA admits the existence of considerable regional differences at the level of infrastructure safety on TEN-T roads between Member States,⁶ and points to the fact that the current EU legislation 'does not provide for a common methodology to measure the crash risk of road infrastructure' (IA, p. 14). With regard to this information, the IA relies on data on safety levels of national roads from the international non-profit organisation European Road Assessment Programme and the results of the open public consultation (see below).

(2) Lower in-built safety on roads outside TEN-T

Although the IA estimates that the TEN-T network comprises only 4 % of the overall road network, where 8 % of all fatalities occur, it argues that many roads outside the TEN-T network often carry high traffic volumes, while only a small percentage of non-TEN-T roads is motorway standard (IA, p. 15). This often results in security risks and may lead to road accidents.

The main issues are, according to the IA, the result of four **problem drivers** (IA, p. 16-20):

(1) Ineffective national procedures and knowledge sharing does not result in improved practices

Despite transposition of the RISM Directive into Member States' legal systems, the IA points to the existence of different national levels of implementation and different levels of compliance with the Directive (IA, p. 16). Furthermore, it notes the complexity of several national procedures, insufficient national guidelines, or a lack of clarity in RISM procedures. Despite mentioning it in a title, the problem driver does not clearly discuss ineffective knowledge sharing.

(2) Management procedures do not sufficiently take vulnerable road users into account and are not future-proof for new technologies

The IA notes that vulnerable road users (pedestrians, cyclists, motorcyclists) are not currently explicitly protected by the RISM Directive, although they account for approximately 46 % of all road fatalities (IA, p. 17). Furthermore, the RISM Directive needs to react to the newest technological developments (e.g. automated driving, advanced driver assistance systems).

(3) Road infrastructure safety management procedure findings are not systematically followed-up, due to lack of funding

Current EU legislation does not include any incentives to follow the recommendations arising from the RISM procedures. The key root cause of this driver is 'the availability and level of funds allocated to road infrastructure safety' (IA, p. 19). The IA notes a decrease in public spending on road infrastructure in the EU of about 30 % between 2006 and 2013, and refers to significant cuts in maintenance activities in several Member States. It also points to the limited impact of national safety audits on existing road infrastructure and that Member States are not obliged to report on RISM activities carried out in accordance with the RISM Directive (IA, p. 20).

(4) Safety management procedures are not widely applied on the non-TEN-T network

The roads outside the TEN-T network are usually of a lower standard, leading to a higher number of fatalities. Although Member States can voluntarily extend the application of the TEN-T safety management procedures to non-TEN-T roads, and 18 Member States currently do, this voluntary extension varies. This leads to a lack of consistency in the application of the RISM procedures outside the TEN-T network (IA, p. 20).

The IA presents a problem tree that illustrates the problems, problem drivers and the objectives (IA, Figure 2, p. 10). This clarifies the link between the problem drivers, the main problems and the general problem. Generally, the problem definition provided in the IA is coherent and comprehensible. In

addition, the terminology used by the IA is easy to understand. The analysis is supported by various graphs and tables, making it relatively easy to understand the links between problems and their drivers.

Objectives of the initiative

The initiative's **general policy objective** is to reduce the number of road fatalities and serious injuries on EU road networks (IA, p. 26). The **specific objectives** are to: (1) foster harmonisation and better use of knowledge sharing between Member States on RISM procedures; (2) protect vulnerable road users; (3) improve the deployment of new technologies on EU road networks; and (4) improve the follow-up on road infrastructure safety management procedure findings, while not imposing excessive costs on Member States (IA, p. 26-27).

The specific objectives align with the problems, and the general objective aligns with the problem consequences identified above. They derive directly from the identified problems and their drivers. Nevertheless, their presentation is very short and could have been more explicit, in particular regarding the distinction between general and specific objectives and the level of policy action to achieve the latter, as outlined in the [better regulation guidelines](#). Also according to these guidelines, specific objectives should be 'S.M.A.R.T.' (specific, measurable, achievable, relevant and time-bound), to allow for effective monitoring and evaluation of the achievement of the objectives. Not all of these criteria appear to be fulfilled in this case. This is particularly relevant as the IA does not present operational objectives, also requested by the better regulation guidelines and toolbox ([Tool #16](#)). Notwithstanding these weaknesses, the objectives are in line with the Commission's Road Safety Programme 2011-2020 and its intentions to reduce road fatalities.

Range of options considered

In addition to the baseline scenario assuming that Member States continue to apply the current EU RISM legislation, the IA presents 14 **retained policy measures**, which are grouped around the different problem drivers which they aim to address. A short description of each of these policy measures and their actions is provided (IA, p. 27-31) The IA also briefly introduces three policy measures that were discarded at an early stage (IA, p. 32). The retained policy measures are combined in six incremental policy options. Policy options 1-3 limit the policy intervention to the TEN-T network, while policy options A-C **extend the scope of the policy intervention beyond the TEN-T network**.

Option 1 – Light intervention within the current scope (limited to the TEN-T)

This option calls for minimum change at minimum cost, while taking account of technological changes and proposing limited legislative changes. This option combines: (1) non-legislative (soft law) measures, including promotion of knowledge sharing and exchange of best practices; (2) legislative measures to improve the transparency of the RISM procedures are also introduced; as is (3) the requirement to focus on assessing the safety of vulnerable road users; (4) the requirement to review the RISM procedures regarding the support of new technologies; and (5) improved interface between the RISM Directive and Tunnels Directive (IA, p. 33).

Option 2 – Moderate intervention within the current scope (limited to the TEN-T)

In addition to measures included in Option 1, Option 2 encompasses further legislative measures including: (1) compulsory follow-up to the RISM procedures; (2) requirement for network-wide safety inspections; and (3) establishment of general performance requirements for road markings including road signs on TEN-T roads. Furthermore, Option 2 intends to: (4) include elements of the Safe System approach;⁷ (5) address the lack of consistent and comparable data regarding the safety level of the road network; and (6) include a new RISM procedure – the road assessment programme – a tool to implement the Safe System approach across the entire road network concerned (IA, p. 33).

Option 3 – Ambitious intervention within the current scope (limited to the TEN-T)

In addition to measures included in Option 2, the third option intends to set a minimum safety level to be achieved at EU level. It presents further legislative measures including: (1) a measure to ensure that roads fulfil minimum safety rating requirements; and (2) general performance requirements for certain road furniture (e.g. motorcycle-friendly guardrails) (IA, p. 34).

Option A – Conditionality of EU funds on main/national roads (beyond the TEN-T)

Option A intends to transform a recommendation (to apply the RISM procedures in national road infrastructure) included in the RISM Directive into a legal obligation for Member States. This option includes a measure requiring that 'any road project on the national road network financed fully or partly with EU funds would have to be subject to the procedures prescribed in the RISM Directive' (IA, p. 36).

Option B – Extension of current RISM provisions to main/national roads (beyond the TEN-T)

While including the measures provided in Option A, Option B intends to extend the application of the RISM provisions to 'the busy roads of Member States' primary road network'. Namely, the provisions on road safety impact assessments, road safety audits, road safety inspections and network safety management should be made mandatory for national/main roads outside the TEN-T network (IA, p. 36).

Option C – Extension of Option 2 measures to all main/national roads (beyond the TEN-T)

While encompassing the measures included in Options A and B, this option also extends the measures proposed in Option 2 to national/main roads. Furthermore, it proposes obligations to: (1) inform the public about available procedures; (2) compile a risk based prioritised action plan; and (3) carry out network-wide safety inspections. However, no uniform minimum level of safety at EU level for the primary road network is envisaged in this option. The IA notes this option can be used only in combination with policy option 2 or policy option 3.

The overall presentation of the options' content is clear. Additionally, the division of options between those addressing the TEN-T network only, and those going beyond, provides additional clarity. However some of the options (e.g. Option A and Option B) are discussed only marginally. Furthermore, the IA does not provide brief summaries of the advantages and disadvantages of each option. The 'retained policy measures' mentioned above were linked to individual policy options in two tables (IA, Table 3, p. 34-35 and Table 4, p. 37-38). The IA does not provide a description of discarded policy options, although it provides three discarded 'policy measures'. Providing discarded policy options could have further increased the transparency and clarity of an otherwise clear IA.

The preferred option is **policy option 2 combined with policy option C**.

Scope of the impact assessment

The IA analyses the social, economic and environmental impacts of all six options. The estimated impacts (social and economic) of all individual policy options, including the baseline scenario, are described in detail in IA Annex 4 (Analytical methods). The only social impact discussed in the IA is the reduction in road fatalities and serious injuries (IA, p. 39 and 42).

The IA compares the options in terms of effectiveness, efficiency, coherence and proportionality, in line with the BR guidelines. Policy option 3 is considered to be the most effective with regard to TEN-T roads only, while policy option C is the most effective regarding the options going beyond the TEN-T network, as these options tend to reduce the number of road fatalities by 2030 by the highest percentage (13.8 % and 9.4 % respectively) (IA, p. 46). The most effective option in absolute numbers is policy option C. As to efficiency, policy option 2 exhibits the highest net benefits, while policy option 1 shows the highest benefit-cost ratio regarding the TEN-T networks. Among policy options going beyond the TEN-T network, policy option C brings the highest net benefits, while the highest benefit-cost ratio is linked with policy option B. Regarding coherence, policy options 1, 2 and A score

higher than the other options. With regards to proportionality, the IA only notes that policy option 3 is the least proportionate and that policy options B and C are proportionate. However, the way in which the IA tackles proportionality is very limited and artificial, despite the fact that this point was also raised in the Regulatory Scrutiny Board's opinion. According to the IA, the preferred option 'could save over 3 200 lives and avoid more than 20 700 serious injuries during 2020-2030, relative to the baseline' (IA, p. 50), and monetisation of the social impacts of the preferred option can lead to savings amounting to approximately €26 billion by 2050 (IA, p. 39 and 42). The question of the availability of funding (which was identified as one of the drivers of the problems) is not discussed among the economic impacts of the proposal.

Subsidiarity/proportionality

The Commission proposal is based on Article 91(c) TFEU (transport). According to the IA, the necessity test shows that negative externalities of road accidents are 'trans-boundary problems' that require coordinated EU action, especially when taking into account that the scope of the current legislation is the TEN-T network. The EU added-value test furthermore shows that EU level action would bring clear benefits (such as the functioning of the internal market or coherent travel experience for passengers and freight transport) compared to national action (IA, p. 25). The IA, however, does not explain how the principle of proportionality has been addressed in the analysis. At the time of writing, no national parliament has submitted a reasoned opinion on this proposal. The deadline for doing so is 19 July 2018.

Budgetary or public finance implications

The IA notes that 'the main economic impact of the policy options relates to the regulatory costs associated with the policy measures' (IA, p. 40). Compliance costs (limited to TEN-T) at the EU level for policy option 2 over the period 2020-2050 are estimated at approximately €2 004 million (IA, Table 5, p. 40). These costs include one-off costs (e.g. investment or undertaking programmes) and recurring maintenance costs, estimated at €10 000 annually per Member State. At the Member States' level, the compliance costs with this option are estimated at €216.5 million in 2030 (IA, Table 6, p. 41). Compliance costs (beyond TEN-T) at the EU level for policy option C, over the period 2020-2050, are estimated at approximately €7 440 million (IA, Table 7, p. 43). These costs include one-off costs (e.g. investment or undertaking programmes) and recurring maintenance costs, estimated at €30 000 annually per Member State. At the Member States' level, the compliance costs with this option are estimated at €806.5 million in 2030 (IA, Table 8, p. 43-44). The estimated cost of the preferred combination of options is therefore approximately €9 444 million at the EU level. This is a result of 'implementing the relevant procedures and making the necessary upgrades to the road network' (Executive summary, p. 2).

On the other hand, the explanatory memorandum accompanying the legislative proposal claims the proposal has **no budgetary implications for the EU** 'although the network-wide road assessment could be used as criteria for targeting EU spending' (Explanatory memorandum, p. 10).

SME test/Competitiveness

The IA notes that effective follow-up of the RISM procedures will result 'in many relatively small scale interventions aimed to upgrade the safety of the existing road network' (IA, p. 41 and 44). According to the IA 'SMEs are likely to benefit from the initiative', as these activities will be carried out by them. Because of the relatively localised nature of these activities, the IA does not expect any impact on the competitiveness of EU companies (IA, p. 42 and 44).

Simplification and other regulatory implications

The IA, in its section on problem definition, includes a note on the Tunnels Directive. It points out that the ex-post evaluation did not identify 'any safety improvements to be realised through the integration of the two Directives' (IA, p. 20). According to the IA, merging the RISM Directive and the Tunnels Directive would be artificial and would not reduce the administrative burden. This is

supported by the results of the online public consultation and the results of the Tunnel Safety Committee meeting (November 2017). Only the issue of tunnel portal areas, where open road and tunnels meet, should be addressed by a revision of the RISM Directive (IA, p. 21).

Quality of data, research and analysis

The IA presents analysis that is a combination of qualitative and quantitative research. It builds on the outcomes of two ex-post evaluations of both directives and on an impact assessment support study carried out by an external consultant (COWI).⁸ With regard to the RISM Directive, the evaluation: (1) encourages a generalised use of RISM procedures; and (2) shows that the RISM Directive provides a 'common language' for carrying out these measures. Furthermore, it argues that despite a positive impact on Member State practices, the Directive: (3) has not provided an incentive to extend the exchange of good practices across Member States; and that (4) the Directive's scope is limited to the TEN-T roads which account for only 8 % of the total road fatalities in the EU (IA, p. 8).

The external support study, despite being quoted numerous times in the IA, is neither available online at the time of writing, nor annexed to the IA. The IA also takes account of data from the European Road Assessment Programme, an international non-profit organisation of automobile clubs, road authorities and researchers, and data included in the Community Road Accident database. The IA makes several assumptions with regard to the social impacts of the policy options, as well as cost assumptions when assessing economic impacts of policy options (IA, Annex 4, pp. 48-60). Compliance costs under the different policy options are divided according to individual Member States (IA, p. 41).⁹ The IA applies (and describes) three different analytical models: (1) the PRIMES-TREMOVE transport model, projecting an evolution of demand for passengers and freight transport by transport mode and transport mean; (2) the TRL model, estimating benefits and costs associated with policy measures assessed; and (3) the COWI model, assessing the impacts of measures related to infrastructure on road safety (Annex 4, p. 27-36). The analysis provided by the IA is generally clear, consistent and illustrated by numerous figures and tables. Nonetheless, more specific information about the methodological challenges and limitations would have increased the IA's transparency and accessibility.

Stakeholder consultation

The Commission carried out the following consultation activities with various stakeholders. (1) While preparing the IA it met with a wide range of key stakeholders, including representatives of road users (e.g. European Cyclists' Federation, European Transport Security Council), manufacturers (e.g. Michelin, 3M), national authorities or the Commission's committees on tunnel safety and on RISM. The IA does not enumerate the stakeholders in total. (2) The Maltese EU Presidency, together with the European Commission organised a high-level stakeholder seminar (March 2017) that brought together road safety experts, stakeholders and policy makers. The seminar's [recommendations](#) are available online. (3) A targeted stakeholder survey and individual interviews with stakeholders were carried out by an external contractor (COWI). The targeted survey only received 27 replies from road authorities, road user organisations, traffic safety experts and NGOs. In addition to these stakeholders, the contractor interviewed Member State authorities and the EIB. (4) Preliminary results of the IA support study were presented during a meeting of the Committee on tunnel safety and the Committee on RISM (November 2017). (5) An [open public consultation](#) on road infrastructure and tunnel safety ran between 14 June and 10 September 2017, and received 74 replies from individuals,¹⁰ NGOs, regional, local and national authorities, business associations, private enterprises and other stakeholders. The consultation [results](#) are available online.

Based on the data included in the IA, stakeholders generally supported the preferred option. Stakeholders were consulted on the recent trends in infrastructure safety management and their views were reflected in the problem definition, description of problem drivers and the options assessment sections of the IA report. Throughout the analysis, the IA mentions stakeholder positions consistently, although briefly. The IA points out that, regarding safety levels on national roads, a large majority of stakeholders experienced differences between Member States (IA, p. 14). The stakeholder

consultations also showed that the clarity and effectiveness of the RISM procedures as transposed in the Member States could be improved (IA, p. 16). A synopsis of the stakeholder consultations is included in the Annex, Part 2 of the IA (pp. 7-23), in line with the [better regulation guidelines](#).

Monitoring and evaluation

The executive summary of the IA, as well as the explanatory memorandum accompanying the proposal, note that the Commission intends to carry out an evaluation to verify whether the objectives of the initiative have been met and to assess the impact of the legislation once the legislative framework has become applicable in its entirety (Explanatory memorandum, p. 10). No specific details are provided regarding an appropriate timeframe for such an action as this will also be 'established after the new framework has become applicable in its entirety' (Explanatory memorandum, p. 10). The proposed directive obliges Member States to submit a report to the Commission within 24 months following the entry into force (and every three years thereafter), 'on percentage of the road network assessed by network-wide road assessment in the preceding three years, and the safety rating of the road sections assessed by category of road users' (proposed Article 11a). The IA points out that, as part of the legislative framework, the Commission intends to propose a set of key performance indicators relating to the safety quality of road networks (IA, p. 51). However, the IA does not address the key indicators in detail. Furthermore, neither the proposal nor the IA envisage submission of an evaluation report by the Commission to Parliament.¹¹

Commission Regulatory Scrutiny Board

The Regulatory Scrutiny Board (RSB) issued a positive [opinion](#) with reservations on the draft IA on 19 January 2018. While the RSB acknowledged the large volume of information gathered supporting the IA, it spotted several significant shortcomings, including the insufficient delimitation of the expected contribution of the initiative to road safety; insufficient explanation of proportionality of the preferred policy option; ignoring of several conclusions of the evaluations mainly with regard to the Tunnels Directive, and failing to explain how the enforcement problems of this directive will be tackled. As requested by the better regulation toolbox (Tool #12), the IA contains the mandatory annex on the follow-up to the RSB opinion (Annex 1). It appears that the majority of the RSB recommendations have been addressed by the IA, with the exception of the RSB's comments regarding the Tunnels Directive (IA, Annex1, p. 3).

Coherence between the Commission's legislative proposal and IA

The proposal appears to follow the IA's recommendations, in that it is based on the preferred policy option 2 in combination with policy option C. The proposal broadens the mandatory application of the RISM Directive procedures so that they also cover: (1) motorways and primary roads outside the TEN-T network; and (2) roads or road infrastructure projects using Union funding in whole or in part. According to the proposal's explanatory memorandum, it is aimed at addressing the shortcomings of the current RISM Directive (e.g. vulnerable road users and follow-up to all RISM procedures), and is linked to other legislative proposals included in the [third transport package](#) (May 2018). It also explains that a merger of the RISM Directive and the Tunnel Directive is unnecessary, as no reductions in the administrative burden were identified (explanatory memorandum, p. 10).

Conclusions

The IA provides a thorough analysis of the current problems related to road infrastructure safety management in the EU. The definition of the general and specific objectives is consistent. However, some parts of the IA do not entirely follow the requirements of the better regulation guidelines, in that it does not set sufficiently specific and time-bound objectives, and the IA does not provide operational objectives either. The overall presentation of the IA's options is balanced and their alignment with the Commission's Road Safety Programme is clear. The analysis focuses on reducing the number of road fatalities and serious injuries (social aspect), but also quantitatively assesses the costs and benefits of increasing the quality of the road network outside the TEN-T. Environmental

effects or effects on SMEs are discussed only partially. Furthermore, the IA's assessment of the options in terms of their proportionality is very limited and rather superficial. The analysis relies heavily on the support study commissioned for the IA but as the study itself is not publicly available, this impacts on transparency and readers' ability to verify the data included in the IA. Publication of the support study could improve the IA's completeness, transparency and accessibility. Stakeholder views are reflected in the various sections of the IA and the Commission appears to have made the effort to accommodate stakeholder input.

ENDNOTES

¹ The TEN-T Network is a part of a broader system of Trans-European Networks that, in addition to transport, includes energy infrastructures and networks for telecommunications. See, M. Remáč, [Trans-European Transport Network \(TEN-T\)](#), EPRS, 2018. An initial appraisal of the Commission's impact assessment linked to the TEN-T Regulation 1315/2013 is due to be published in July 2018.

² The Tunnels Directive is applicable only to tunnels in the Trans-European Road Network with lengths of over 500 m.

³ COM(2010) 389 final

⁴ The strategic objectives are: (1) improve education and training of road users; (2) increase enforcement of road rules; (3) safer road infrastructure; (4) safer vehicles; (5) promote the use of modern technology to increase road safety; (6) improve emergency and post-injuries services; and (7) protect vulnerable road users.

⁵ [Study](#) on the effectiveness and on the improvement of the EU legislative framework on road infrastructure safety management (Directive 2008/96/EC) (2015) and [Study](#) on the implementation and effects of Directive 2004/54/EC on minimum safety requirements for road tunnels in the trans-European road network (2014).

⁶ The situation was analysed in four western European countries (France, the Netherlands, Spain, the United Kingdom) and in nine eastern European countries (Bulgaria, Croatia, Czech Republic, Greece, Hungary, Poland, Romania, Slovakia and Slovenia).

⁷ The Commission intends to establish this safe system approach to road safety at EU level. The system is based on the principles that human beings can and will continue to make mistakes and that it is a shared responsibility for actors at all levels to ensure that road accidents do not lead to serious or fatal injuries. It implies closer cooperation between authorities and monitoring of results through key performance indicators (IA, p. 3 and p. 26.).

⁸ COWI/SWOV (2017), Impact assessment support study for the revision of Directive 2008/96/EC on road infrastructure safety management and Directive 2004/54/EC on minimum safety requirements for road tunnels in the trans-European network. In June 2018, the study was not accessible online.

⁹ The costs were divided according to the length of the roads concerned and their current level of safety (IA, p. 40).

¹⁰ When evaluating the results of the consultation, the Commission took into account that 19 replies were received from individuals from Luxembourg which influenced the value of the results.

¹¹ Similarly, the current version of the directive does not require the Commission to submit a similar report to the co-legislators.

This briefing, prepared for the TRAN committee, analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

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